

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Jonathan Zamora-Coronado

YOB: 1990

Principal

the United Mexican States

United States District Court  
Southern District of Texas  
FILEDCase Number:  
M-16-1750 -M

SEP 20 2016

(Name and Address of Defendant)

Clark of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 19, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

*JK Humberto* knowing or in reckless disregard of the fact that Francisco Moreno-Morales, a citizen and national of the United Mexican States, and Mario Chavez-Avila, a citizen and national of Honduras, and three (3) other undocumented aliens, for a total of five (5) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near Penitas, Texas to the point of arrest near Penitas Texas,

in violation of Title 8 United States Code, Section(s) 8 USC 1324 (a)(1)(A)(ii) & 1326

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On September 19, 2016, Agent Romero, assigned to aerostat cameras, observed several people raft across the Rio Grande River and make landfall in the United States. Border Patrol Agents J. Domenech and G. Spinner responded to the area to search for the subjects. Agent Romero notified the responding agents that he observed one individual, who appeared to be guiding the group, run back towards the brush line near the river after guiding the group to a ditch near Military Highway and the levee wall. Agent Domenech searched and located five people attempting to conceal themselves in the ditch where Agent Romero had last seen them. Agent Domenech questioned the people and determined them all to be illegally present in the United States.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

*Reviewed by: Linda Requena, ASA  
9/20/16*

Signature of Complainant

Jon M. Chan

Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

September 20, 2016  
Date

at McAllen, Texas  
City and State

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Dorina Ramos  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-16-1750 -M**

**RE: Jonathan Zamora-Coronado**

Agent Spinner, along with Department of Public Safety (DPS) Troopers, searched the brush line near the Rio Grande River in an attempt to locate the person seen guiding the group. The person, later identified as Jonathan ZAMORA-Coronado, was located and apprehended while he was attempting to abscond back to Mexico.

All subjects were placed under arrest and transported to the McAllen Border Patrol Station for processing.

**Principal Statement:**

Jonathan ZAMORA-Coronado was advised of his Miranda Rights, stated he understood his rights and agreed to answer questions without the presence of an attorney.

ZAMORA stated he was apprehended guiding a group of illegal aliens in the United States. ZAMORA claimed he smuggles illegal aliens about four times a month and he gets paid 50.00 USD per illegal alien. ZAMORA stated he has been apprehended by Border Patrol on five different occasions for smuggling aliens.

**Material Witness Statements:**

Francisco MORENO-Morales, a citizen and national of the United Mexican States, and Mario <sup>JMC</sup>CHAVEZ-Avila, a citizen and national of Honduras, were advised of their Miranda Rights, stated they understood their rights and agreed to answer questions without the presence of an attorney.

**Material Witness 1:**

Francisco MORENO-Morales paid a smuggler 1,899.00 Mexican Pesos to be smuggled into the United States. MORENO states he was apprehended with six other people including the guide. MORENO described the guide to have a mustache, with short hair and wearing a black shirt. MORENO claimed the guide instructed the group to follow him and look out for Border Patrol.

MORENO identified ZAMORA in a photo lineup as the person guiding the group.

**Material Witness 2:**  
<sup>Humberto JMC</sup>

Mario CHAVEZ-Avila paid a smuggler in Mexico 800.00 USD to be smuggled into the United States. CHAVEZ claimed he crossed the river with a total of six people including one guide. CHAVEZ described the guide to be in his twenties, with a mustache, short hair and wearing a black shirt. CHAVEZ stated the guide was at the front of the group and would give the group instructions. The guide would tell the group to keep up and follow him.

CHAVEZ identified ZAMORA in a photo lineup as the person guiding the group.